

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MICHAEL LAWRENCE LOMBARDO,	:	CIVIL ACTION
	:	
Plaintiff,	:	No. 2:24-cv-01711-KBH
	:	
v.	:	
	:	
CHRISTOPHER BRYAN LEONARD and	:	
IMS TECHNOLOGY SERVICES, INC.,	:	
	:	
Defendants.	:	

**DEFENDANT CHRISTOPHER BRYAN LEONARD’S MOTION TO DISMISS  
PLAINTIFF’S AMENDED COMPLAINT**

Defendant Christopher Bryan Leonard, by and through his counsel Kaufman Dolowich LLP, hereby files this Motion to Dismiss Plaintiff’s Amended Complaint, for the reasons stated in the accompanying Memorandum of Law, which is fully incorporated herein.

**KAUFMAN DOLOWICH LLP**

/s/ Gregory S. Hyman  
Gregory S. Hyman, Esq.  
Jennifer L. Prior, Esq.  
One Liberty Place  
1650 Market Street, Suite 4800  
T: (215) 501-7002  
ghyman@kaufmandolowich.com  
jprior@kaufmandolowich.com  
*Counsel for Defendant  
Christopher Bryan Leonard*

Dated: June 21, 2024